



BUREAU OF LAND MANAGEMENT

FUELS TREATMENT PROGRAM

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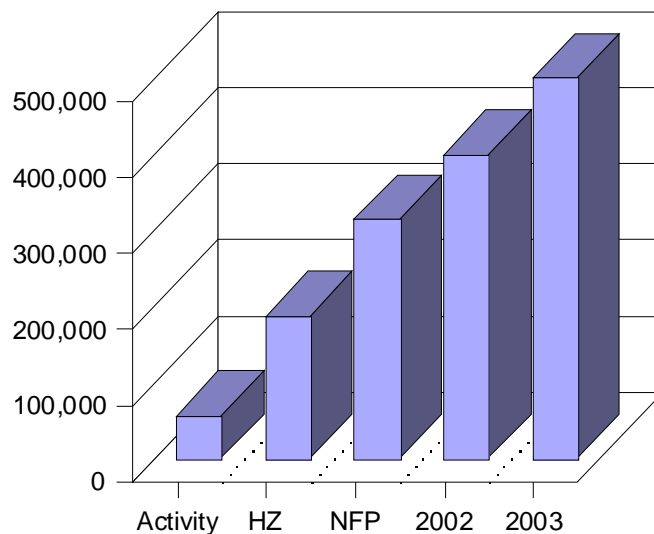
FUELS TREATMENT PROGRAM

INTRODUCTION

Since the inception of the National Fire Plan (NFP), federal agencies have been allocated additional funding to increase firefighting capabilities and expand fuel treatment programs. With this funding BLM has significantly increased its fuel treatment work. Prior to 1998, the agency treated an average of 57,000 acres per year; for 2003, BLM's target is 500,000 acres. Projects and activities in 706 communities in the wildland-urban interface are planned, and 406 risk assessments and mitigation plans are currently underway to reduce risks from wildland fire. We are also working with our cooperators to sponsor more than 1,500 programs such as FIREWISE, Living With Fire and other related outreach activities to prevent fires and reduce the risk of fire to the public and environment.

We can be proud of the work we've accomplished so far. However, with yet another severe fire season this year in which hundreds of communities have been threatened or damaged by fire, we must do more, and we must do it faster. President Bush has called for active management through his Healthy Forests Initiative. The President has directed Agriculture Secretary Veneman, Interior Secretary Norton and Council on Environmental Quality Chairman Connaughton

to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildfires by restoring forest health.



Secretary Norton identified in a recent memo, dated August 21, 2002, potential obstacles to timely application of fuel treatments in the fall: a lengthy fuel project selection process; unclear contracting procedures; and delays in the allocation of funds for fuels projects. She also noted that she has addressed the first two obstacles with new procedures to expedite the nomination and selection of fuels projects, and guidance to contracting officers to expand the use of contracts and streamline contracting procedures. Secretary Norton also announced in this memo a new policy regarding the allocation and availability of funds in the wildland fire management appropriation account that should help agencies accelerate their treatment programs.



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The Secretary has taken steps to help quicken the pace of our fuel treatment programs, but there is still more that can be done from a field, state and national level to facilitate fuel treatment.

This briefing outlines some of the issues BLM faces today in accelerating fuel treatment, along with background information, recommendations and suggested actions to resolve the issues. It's divided into five sections: Cultural Change; Roles, Responsibilities and Accountability; Organization; Enhancing Operational Efficiencies; and Data Management and Budget.

Of special note among the recommendations and actions are several common themes: identify the National Fire Plan as an interdisciplinary BLM priority; consolidate data management systems and requests; restructure budget processes to ensure continuity of funding for project work; and increase capability to meet fuel treatment goals.





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CULTURAL CHANGE

ISSUE

Historically, the wildland fire management program has been viewed as a service organization established to suppress wildfires and implement prescribed burns proposed by resource specialists. The establishment of the hazardous fuel program requires a shift in our perception of the program. Fuel management within the BLM is a program similar to range, watershed and soils.

BACKGROUND

Since the NFP, the fuels program has grown in scope and emphasis. However, it has not yet been integrated into all areas of BLM resource management. To implement the President's Healthy Forests Initiative, internal capabilities must be increased, and to accomplish the President's goals, we will need to expand our partnerships with states, counties and other cooperators.

Because the fuels program has not been fully integrated into resource management, it is staffed primarily by fire suppression personnel. During an active fire season, it is difficult to accomplish fuel treatment work, and personnel are more highly paid to do suppression work than fuels work.

RECOMMENDATIONS

- Increase public and internal education through partnerships and additional staff.
- Organize better internally to support the National Fire Plan.
- Require commitment throughout the organization.
- Implement projects on the ground.
- Implement a better system to measure success.
- Allow flexibility of funding to do the whole job and do it right.



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CULTURAL CHANGE

ACTIONS

- Develop a concentrated education campaign to inform external and internal audiences about fuels management.
- Continue internal/interagency workshops to facilitate an interdisciplinary approach to fuels management.
- Expand the organization to include specialists in fire education and fire ecology.
- Develop a realistic data collection system.



Baker City Field Office in Oregon.



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ROLES, RESPONSIBILITIES, ACCOUNTABILITY

ISSUE

As a result of the President's Initiative, BLM must place a high priority on and better integrate fuels management to mitigate risks to communities and improve forest and rangeland health.

BACKGROUND

Fire personnel have not traditionally been well integrated into interdisciplinary teams when the teams are analyzing projects or developing land use plan alternatives. The exception is when teams are addressing specific prescribed fire projects. Therefore, BLM has not identified forest and rangeland health issues for each vegetation type, in which fuels management should be given priority in mitigating these issues.

RECOMMENDATIONS

- Establish, in writing, the implementation of the National Fire Plan as a BLM priority.
- Identify roles and responsibilities for line officers, fire management officers and resource specialists.
- Hold state directors and field managers accountable for developing interdisciplinary solutions to resource issues related to vegetation and fuels management.

ACTIONS

- Identify fuels activities as a measure of performance in state director and field manager EPPRs.
- Identify fuels management as a BLM priority in the 2003 annual work plan. At a minimum, each field office should identify an opportunity for an interdisciplinary solution to a forest/range health issue in 2003 and submit it for 2004 funding.



Medford Field Office in Oregon.



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ORGANIZATION

ISSUE

Enhance the organization to enable accelerated fuel treatments and close coordination with resource programs.

BACKGROUND

The increased workload resulting from the National Fire Plan has emphasized the BLM's lack of resource specialist and contracting capabilities. Organizationally we are operating at the highest level possible. Contracting expertise and authority are not located in the right place. Added support in contracting is necessary for the fuels program to be successful. (There are instances where large contracts have taken up to 14 months to get through centralized contracting.)

RECOMMENDATIONS

- Increase planning and National Environmental Policy Act (NEPA) compliance capabilities; mitigation and education specialists; staff dedicated to fuels, including forest, range and other resource specialists; and bring into the organization people with business acumen.
- Establish reserves (grass banks) to provide alternative forage for permittees so they have somewhere to graze their livestock while project work is done on their allotment.

ACTIONS

- Increase business management skills in managers and staff.
- Redefine the roles and responsibilities of managers in light of the National Fire Plan.
- Review table of organization to ensure adequate forest, range, resource, biomass and contracting specialists.
- Use land health indicators to set up vegetative management priorities for all programs (as agreed to during the land health workshop).



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FUELS TREATMENT PROGRAM

ENHANCING OPERATIONAL EFFICIENCIES

ISSUE

Contracting and Warrant Authorities: Built-in institutional barriers within BLM prevent rapid contract implementation.

BACKGROUND

The implementation of the National Fire Plan has caused a major workload increase for BLM contracting officials. We must evaluate this workload and anticipate staffing appropriately. Contract support is insufficient, particularly for IDIQ contracts, at both the state and national level. A good start has been made on IDIQ contracting nationally, but emphasis needs to be placed on regional use and acceptance of IDIQ. BLM contracting doesn't consider the National Fire Plan a top priority in many locations. Higher warrant authorities need to be established at state and local levels. Fire staff don't have enough experience with contracting yet.

RECOMMENDATION(S)

- Identify contracting workload increase from implementing the National Fire Plan, and staff appropriately.

ACTION(S)

- Revisit the Department of the Interior's National Fire Plan Contracting Review and implement its recommendations.
- Hire a sufficient number of contracting officers and project inspectors to support the National Fire Plan.
- Identify the National Fire Plan as a national priority for contracting.
- Move contracting authority to lowest level possible.
- Increase the use of indefinite delivery, indefinite quantity (IDIQ) contracts that are already available.



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ENHANCING OPERATIONAL EFFICIENCIES

ISSUE

Appeals or the threat of appeals and/or litigation has significantly increased the time and cost of the NEPA process and slowed implementation of fuel treatment projects.

BACKGROUND

The rigor of analysis expected during planning has increased significantly since NEPA was enacted. Expectations, both internal and external, have created a process that is time-consuming and costly. Even well done NEPA with local collaboration and acceptance can be challenged with a 37-cent stamp.

RECOMMENDATION(S)

- Ensure that fuels management and forest and rangeland health are addressed in land use plans.
- Develop programmatic NEPA documents such as the bureauwide vegetative environmental impact statement (EIS), or develop state-level vegetative management documents, to which environmental assessments for specific projects can be tiered.
- Involve partners in planning including other federal agencies, local government and stakeholders (environmental, industry and service organizations).



Pinedale Field Office in Wyoming.



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ENHANCING OPERATIONAL EFFICIENCIES

ISSUE

Current facilities do not provide enough space to house additional fire suppression staff and fuels program staff.

BACKGROUND

The last major effort to evaluate fire facility needs occurred prior to the implementation of the National Fire Plan. Because of this, staffing requirements to support the National Fire Plan have not been factored into current facility capacities. There is a limitation on facility construction (\$5 million - DOI). These funds are inadequate and do not address increasing needs for the expanded fuels program.

RECOMMENDATION(S)

- Streamline facility funding, planning and construction.
 - Hire engineering staff in the BLM's national Office of Fire and Aviation to deal with fire and fuels facilities.
 - Reduce internal resistance to modular and pre-engineered buildings, leasing, renting, or other facility alternatives.
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ISSUE

Limitations in the administratively determined (AD) pay plan and lack of authority for BLM to enter into personal services contracts significantly slows or, at times, even prohibits us from accomplishing hazardous fuels work.

BACKGROUND

We have developed a valuable workforce of Native Americans and Hispanics through the AD program. This allows us to quickly employ local firefighters to treat fuels. These folks are trained, come with supervision, can be mobilized quickly and terminated when projects are completed.

RECOMMENDATION(S)

See section "Action Items Requiring Regulatory Changes or Legislative Action"



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ENHANCING OPERATIONAL EFFICIENCIES

ISSUE

The safety of our employees during wildland and prescribed fire operations is an increasing concern based on the increasing fuel treatment work and continuing severe, intense and long fire seasons.

BACKGROUND

Fuel treatments are one of the most effective methods of reducing risks to communities and firefighters. BLM has increased fuels targets from 57,000 acres before 1998 to 314,000 in 2001, which is an increase of more than 500 percent. In 2002 target, BLM's target is 400,000. Additionally, suppression seasons continue to be long and intense. Although our safety record during this huge expansion has been outstanding, concern is increasing commensurate with the work for the safety of our employees. Cumulative fatigue and stress at all levels of the fire program are chronic and at high levels.

RECOMMENDATION(S)

- We all need to recognize the human impacts of our continued high workloads and the effects on safety at all levels, and be prepared to take whatever action safeguards the health and well-being of our employees.
 - Increase staffing to meet needs, spread emphasis across the whole organization and reduce impacts of data demands.
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ISSUE

Stewardship: Trading goods for services is prohibited in fuels management.

BACKGROUND

The General Accounting Office (GAO) has determined that the BLM is not authorized to use the commercial value of vegetative resources in return for services. This is considered to be an "augmentation of appropriation," which is prohibited by law. This limits our ability to remove biomass and offset costs of fuels management projects.

RECOMMENDATION(S)

- Establish stewardship contracting authority in contracting and legislation.
- Clarify the current policy, and appropriate methods for handling biomass from fuels management projects.



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DATA MANAGEMENT

ISSUE

Building an interagency data collection system is difficult and takes time. Currently, too many redundant data collection systems exist, and there is no central data base or interagency/interdisciplinary data storage utility or facility. For example, BLM is currently entering data in nine separate systems: Management Information System (MIS); Budget Planning System (BPS); National Fire Plan Operations and Reporting System (NFPORS); Range Improvement Project System (RIPS); Risk Assessment and Mitigation Strategy (RAMS); Fuels and Smoke Tracking Reporting and Collection System (FASTRACS); 1202 Fire Reporting System; Office of Fire and Aviation Manual Fuels Accomplishment Spreadsheet; and the Fire Rehabilitation Project Spreadsheet. The workload associated with these nine systems is unprecedented and virtually impossible to keep current. Additionally, the demand for data is uncoordinated among agencies.

BACKGROUND

Since the inception of the National Fire Plan, the need and demand for data has accelerated considerably and come from several sources. Turnaround times are extremely short and similar data is requested in different formats. Similar data needs exist at all organizational levels, but designing a comprehensive data storage and retrieval system that is pertinent to all organizational levels is a difficult and time-consuming task. The expectations are unreasonable, and there is no interface with states and counties.

RECOMMENDATION

- Eliminate redundant data collection systems. We need one data collection and retrieval system that is compatible with other agency systems. If one system cannot be implemented, then we need a method for cross-over between systems. The data collection system has to be used for a variety of purposes and must have the data required to analyze and develop the program. We must also be proactive in getting data out.

ACTIONS

- Adopt and upgrade Risk Assessment and Mitigation Strategy (RAMS) for BLM's fuels planning system and Fuels and Smoke Tracking Reporting and Collection System (FASTRACS) fuels management databases for fuels program database. These programmatic systems can feed MIS and NFPORS.
- To minimize uncoordinated data requests, establish a web site and issue periodic standardized reports (same theory as daily Incident Management Situation Report).



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DATA MANAGEMENT

ISSUE

Fire budgeting for fuels (2823/24) is a cumbersome process and funds are not always available at the beginning of the fiscal year. We have had difficulty obligating funds to fuel treatment projects until we have an approved budget.

BACKGROUND

The way we handle the budget system in the fire program conflicts with the budget planning system used by the rest of BLM. Funding for projects is needed immediately after the first of the fiscal year. Contracts and project expenditures need to be made during the fall work season. Funding approvals usually do not arrive until the budget is sent to the field later in the year. Some years this is as late as March. Spending authority is needed before this process eliminates three to six months of the work year.

RECOMMENDATION

Establish an agreed upon base funding level for each state and field office. Nationally assigned project numbers for projects that would be in the NFPORS system. Establish a national funding target for 2823/2824. Charge approved project cost directly against the central fund, similar to suppression and emergency rehabilitation. This would facilitate implementing projects on October 1 and as projects are approved. This would be an on going year-round system. Approve projects when they were completed and entered into the NFPORS system on a continuing basis.

ACTIONS

Authorize a direct charge budgeting system through a centralized pot of 2823/2824 with an identified ceiling managed at the national office. When an office implements an approved project, it can charge directly against that project number, rather than wait until money is allocated to the field. This would facilitate project initiation, increase contracting ability, and eliminate the wait for funding.

The above recommendation is a radical departure from the way we have been budgeting the hazardous fuel reduction and wild land urban interface projects. The proposal is to change to a similar funding mechanism as the suppression account.

2821 Suppression Funding: The funding for our suppression account comes from the National Emergency Fund. This \$5 billion fund is drawn on directly. When a fire starts a number is assigned and charges are made to that account. An example would be



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UT-2821-R234. All charges associated with the suppression of that wildfire are associated with that number.

2822 Emergency Rehabilitation Funding: The ESR funding is a product of a proposed project that uses the same fire number that was used by the suppression number. The difference is that the account is now associated with the 2822 fund. Example, UT 2822 – R234. The cost of the project is submitted within 21 days of the fire being controlled and funding is activated from the Denver office for the approved amount.

2823/24 Hazardous Fuels and Wildland Urban Interface Funding: At the present time funding of these types of projects are handled somewhat the same as the suppression and EMR projects. Projects are collected with proposed budget cost attached and forwarded to the National Office once a year. Funding is approved along with the rest of the BLM budget. The budget is usually given out about January or later in the year. This delays contracting and project expenditures until the budget is broken down and passed out to the states. The most recent worst case was when funding was passed out in March, six months after the new fiscal year.

If prescribed fire projects miss the prescription window, the project must be carried over until the next year. This must be noted at the end of the fiscal year and funding must be reassigned to the project.

If a new project is to be proposed, it must wait until the next fiscal year to be proposed and funded.



Durango Field Office in Colorado.

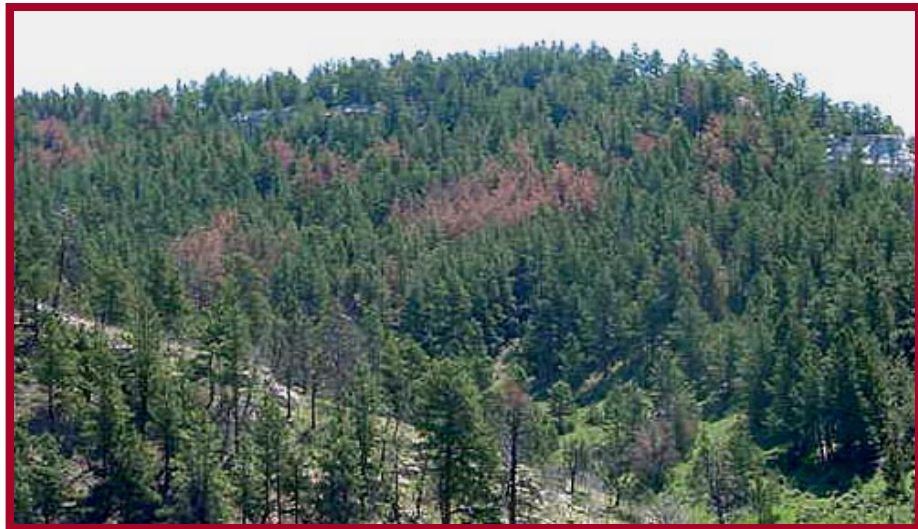


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DATA MANAGEMENT

New Funding Proposal for 2823/24 Projects: The change would be as follows:

1. All projects would be entered into the NFPORs system or identified on the present spreadsheets.
2. Projects would be approved at the NIFC and given a project number. The National Office would control percent of projects for hazardous fuel and WUI split.
3. Funding would identify a base funding level for each of the field offices.
4. There would be a national level spending cap identified for all agencies.
5. Funding would be available for the project year around and would not depend on a once a year approval.
6. Contracting would not have to wait until budget approval, funding would be available year round.
7. Spending cap would be set at a level to cover at least the present number of dollars requested under the NFPORS or spreadsheet.
8. If windows were missed the funding would automatically carry over.



Worland Field Office in Wyoming.



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ACTION ITEMS REQUIRING REGULATORY CHANGES OR LEGISLATIVE ACTION

- Introduce legislation to fix pay inequities in order to address hazard pay and pay for performance.
- Explore the establishment of a BLM Lands Foundation-Legislation Authority.
- Ensure BLM has authority similar to the Forest Service's State and Private Forestry to partner and distribute funds to state, local and other partners.
- Expand and fully utilize existing categorical exclusion coverage.
- Improve the administrative appeals process and standing. We need to evaluate whether it is regulation and/or legislation.
- Implement and expand full force and effect authority (remove automatic stay provisions) for fuel treatment projects in the wildland-urban interface.
- Research authorities that would allow us to make better use of the AD pay plan to hire personnel for fuel treatments, prescribed fire, and wildland-urban interface work projects.
- Establish authority for use of personal service contracts for BLM/DOI.
- Establish stewardship contracting authority in contracting and legislation.